



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

RMT/JN/DG
F. #2012R00103

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 30, 2018

By Hand

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Mildred M. Whalen
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1 Pierrepont Plaza, 16th Floor
Brooklyn, NY 11201

Re: United States v. Vitaly Korchevsky and Vladislav Khalupsky
Criminal Docket No. 15-381 (S-1) (RJD)

Dear Counsel:

The government hereby makes the following additional disclosures in advance of trial. These disclosures are being made subject to the protective order previously entered by the Court on January 5, 2016.

I. Government Exhibits

The government hereby discloses the additional enclosed trial exhibits along with an exhibit log, which are stored on a CD labeled "Government Exhibits" with today's date.

The government reserves the right to supplement this production with additional and/or revised exhibits. As previously indicated in the government's initial disclosure letter, among the exhibits that may be modified are the trading analysis presentations, summary exhibits and underlying datasets. The government also anticipates using additional summary exhibits and demonstratives that will be produced once finalized.

All translations being produced on this date are in draft form. Final translations for any non-English documents will be produced to the defense as they become available.

II. Section 3500 Materials

The government hereby discloses the materials stored on the enclosed CD labeled Government's 3500 Material with today's date pursuant to Title 18, United States Code, Section 3500. The government reserves the right to supplement this production as additional materials are generated or otherwise become available. Also enclosed is an index for the 3500 materials.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
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Enclosures

cc: Clerk of the Court (RJD) (by ECF (w/o enclosures))